

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

LISA LAMBERT,

Plaintiff,

v.

SUPERINTENDENT WILLIAM WOLFE,
et al.,

Defendants.

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CIVIL ACTION NO:
96 CV. 247 Erie

Judge Sean J. McLaughlin
Magistrate Judge BAXTER

(Filed via ECF)

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff respectfully moves for an extension of time of 18 days to December 1, 2006 to file her response to Defendants' Motion for Partial Summary Judgment, for the following reasons:

1. On July 18, 2006, the Court ordered that Defendants' Motion for Summary Judgment be filed by September 6, 2006. On September 6, 2006, Defendants moved for an additional 30 days to October 6, 2006 to file their Motion for Summary Judgment.
2. On September 6, 2006, the Court granted Defendants request, and ordered that Defendants' file their Motion for Summary Judgment by October 6, 2006. On October 6, 2006, Defendants moved for a second extension of time to file their Motion for Summary Judgment.

3. On October 6, 2006, the Court ordered that Defendants' Motion for Summary Judgment was due by October 26, 2006, and Plaintiff's Response to Summary Judgment was due by November 13, 2006
4. Defendants filed a Motion for Summary Judgment on October 26, 2006;
5. The discovery in the case produced numerous documents and depositions, and Plaintiff is now housed in a correctional facility in Massachusetts, while counsel for Plaintiff remains in Pennsylvania, therefore making communication more time consuming;
6. Defendants' counsel graciously consents to granting this motion;
7. This motion is not intended to nor will it unnecessarily delay these proceedings.

Therefore, it is respectfully requested that an enlargement of time to December 1, 2006 be provided for Plaintiff to file response to Defendants' Motion for Partial Summary Judgment.

Respectfully submitted,

/s/Angus Love
Angus Love, ID # 22392
Pennsylvania Institutional Law Project
924 Cherry Street, Suite 523
Philadelphia, PA 19107
(215) 925-2966

Date: October 30, 2006

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|-------------------------------|---|--------------------------|
| LISA LAMBERT, | : | |
| | : | |
| Plaintiff, | : | CIVIL ACTION NO: |
| | : | 96 CV. 247 Erie |
| | : | |
| v. | : | Judge Sean J. McLaughlin |
| | : | Magistrate Judge BAXTER |
| SUPERINTENDENT WILLIAM WOLFE, | : | |
| et al., | : | (Filed via ECF) |
| | : | |
| Defendants. | : | |

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Unopposed Motion for Extension of Time to File Response to Defendants' Motion for Partial Summary Judgment was served upon the following via ECF this 30th day of October 2006:

Rob Willig
Office of the Attorney General
564 Forbes Avenue
6th Floor, Manor Complex
Pittsburgh, PA 15219

I hereby certify that a true and correct copy of Plaintiff's Unopposed Motion for Extension of Time to File Response to Defendants' Motion for Partial Summary Judgment was served upon the following via first class mail this 30th day of October 2006:

James Eicher
209 McConnell Road
New Wilmington, PA 16152

Respectfully submitted,

/s/Angus Love
Angus Love, ID # 22392
Pennsylvania Institutional Law Project
718 Arch Street, Suite 304 South
Philadelphia, PA 19106
(215) 925-2966

Date: October 30, 2006